

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO.: 23-CV-24481-ALTMAN

MICHAEL SIZEMORE, *et al.*, on behalf
of themselves and all others similarly
situated,

Plaintiffs,

v.

CRISTIANO RONALDO,

Defendant.

_____ /

**DEFENDANT RONALDO’S MOTION TO EXCEED PAGE LIMITS
FOR HIS RESPONSE TO PLAINTIFFS’ COMPLAINT**

Defendant Cristiano Ronaldo dos Santos Aveiro (“Ronaldo”), through undersigned counsel and pursuant to Southern District of Florida Local Rule 7.1(c)(2), hereby moves the Court for the entry of an Order enlarging the page limit for Ronaldo’s response to Plaintiffs’ Class Action Complaint (the “Complaint”) [ECF No. 1] by up to (i) an additional thirty (30) pages for an omnibus motion to dismiss, for a total of up to fifty (50) pages; *or alternatively* (ii) to file two separate briefs, one of up to fifteen (15) pages for a Rule 12(b)(2) motion to dismiss, and second of up to thirty-five (35) pages for a separate motion to dismiss for any other responsive arguments, including others under Rule 12(b), Fed. R. Civ. P, whichever is most convenient to the Court. Given that there is good cause for the requested relief the Court should grant this Motion, in further support of which Ronaldo states as follows:

1. On November 27, 2023, Plaintiffs filed their 129-page Class Action Complaint, which includes 425 individual allegations (excluding subparts), 69 footnotes, and nine separate causes of action on what might be charitably characterized as “novel” theories of liability, and alleging exposure in excess of \$1 billion.

2. Ronaldo’s response to the Complaint is currently due on April 25, 2024, pursuant to a Waiver of Service executed on January 29, 2024. *See* ECF No. 15.

3. In order to adequately address the multitude of issues and numerous claims raised in Plaintiffs’ Complaint, Ronaldo seeks leave to file a response that exceeds the presumptive page limit in either of the following manner that is most convenient for the Court:

i. by up to an additional thirty (30) pages for an omnibus motion to dismiss, for a total of up to fifty (50) pages; *or alternatively*:

ii. to file two separate briefs, one of up to fifteen (15) pages for a Rule 12(b)(2) motion to dismiss, and second of up to thirty-five (35) pages for a separate motion to dismiss for any other responsive arguments, including others under Rule 12(b), Fed. R. Civ. P.

4. This Motion for a modest request for additional pages is made in good faith. It is not made for any improper purpose or to burden the Court, but rather for the Court’s convenience. And neither the Court nor any party will be prejudiced by said relief.

WHEREFORE, Ronaldo respectfully requests that the Court enter an Order granting this Motion and allowing Ronaldo to reasonably exceed the page limit for his response(s) to the Complaint as described herein. For the Court’s convenience, a proposed Order granting this Motion is attached as Exhibit A.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Southern District of Florida Local Rule 7.1, undersigned counsel certifies that prior to filing, counsel for Ronaldo conferred with counsel for Plaintiffs regarding the relief requested in this Motion and is authorized to report that Plaintiffs responded by representing that they “take no position” on Ronaldo’s request for such relief.

Dated: April 11, 2024

Respectfully submitted,

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Counsel for Cristiano Ronaldo

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 11, 2024, the foregoing was filed with the Clerk of Court using CM/ECF, which will serve a Notice of Electronic Filing on all counsel of record.

By: /s/ Daniel E. González

Daniel E. González